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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION
REQUESTING LEAVE TO OBTAIN
LIMITED ADDITIONAL DISCOVERY**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion for Leave to Obtain Limited Additional Discovery.

2. My team and I have conferred numerous times with Meta’s counsel regarding the discovery issues addressed in this Administrative Motion. While the parties were able to resolve certain issues, they did not reach agreement on the issues discussed in Plaintiffs’ Motion. Plaintiffs therefore file this Administrative Motion rather than a stipulation. *See* Local Rule 7-11(a).

3. Attached to this Declaration as **Appendix A** is a chart summarizing the document productions Meta has made after the December 13, 2024 fact discovery cut-off, along with related case events.

4. Attached to this Declaration as **Appendix B** is a chart summarizing representations made by Meta in relation to certain discovery issues, documents, and data.

5. Attached to this Declaration as **Appendix C** is a document showing a list of search terms that Plaintiffs request Meta to run over the ML Hub, AIDC, and Guillaume Lample’s custodial files.

6. Attached to this Declaration as **Exhibit A** are true and correct copies of excerpts of the transcript of the Rule 30(b)(6) deposition of Michael Clark on the topic of torrenting, which took place on March 3, 2025.

7. Attached to this Declaration as **Exhibit B** is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00238287.

8. Attached to this Declaration as **Exhibit C** is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00160923.

9. Attached to this Declaration as **Exhibit D** is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00078651.

10. Attached to this Declaration as **Exhibit E** is a true and correct copy of an email thread between Plaintiffs' counsel and Meta's counsel, last dated October 28, 2024.

11. Attached to this Declaration as **Exhibit F** is a true and correct copy of the Second Rebuttal Expert Report of Barbara Frederiksen-Cross.

12. Attached to this Declaration as **Exhibit G** is a true and correct copy of correspondence received from counsel for Meta, dated September 12, 2025.

13. Attached to this Declaration as **Exhibit H** is a true and correct copy of Meta's Further Supplemental and Amended Responses and Objections to Plaintiffs' Second Set of Interrogatories, dated December 13, 2024.

14. Attached to this Declaration as **Exhibit I** is a true and correct copy of Plaintiffs' Third Set of Requests for Admission to Meta, which Plaintiffs request the Court's leave to serve to Meta.

15. Attached to this Declaration as **Exhibit J** is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00238408.

16. Attached to this Declaration as **Exhibit K** is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00238363.

17. Attached to this Declaration as **Exhibit L** is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00238382.

18. Attached to this Declaration as **Exhibit M** is a true and correct copy of an email from Meta's counsel dated September 19, 2024.

19. Attached to this Declaration as **Exhibit N** is a true and correct copy of Plaintiffs' Seventh Set of Requests for Production, dated March 5, 2025.

20. Attached to this Declaration as **Exhibit O** is a compilation of true and correct copies of Meta's Initial Disclosures, Amended Initial Disclosures, and Second Amended Initial Disclosures.

21. Attached to this Declaration as **Exhibit P** is a true and correct copy of a Rule 30(b)(6) Notice of Deposition to Meta Platforms, Inc., dated October 29, 2025, which Plaintiffs request the Court's leave to serve to Meta.

22. Attached to this Declaration as **Exhibit Q** is a true and correct copy of the Rebuttal Expert Report of Barbara Frederiksen-Cross.

23. Attached to this Declaration as **Exhibit R** are true and correct copies of excerpts of the transcript of the first deposition of Barbara Frederiksen-Cross, which took place on March 6, 2025.

24. Attached to this Declaration as **Exhibit S** is a true and correct copy of an email thread between Plaintiffs' counsel and Meta's counsel, last dated October 28, 2025.

25. Attached to this Declaration as **Exhibit T** are true and correct excerpts of an exhibit provided by Meta during the 30(b)(6) deposition of Christopher King on April 2, 2025.

26. Attached to this Declaration as **Exhibit U** are true and correct copies of excerpts of the transcript of the second deposition of Barbara Frederiksen-Cross, which took place on April 4, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of October 2025 in San Francisco, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt